

**IN THE UNITED STATES DISTRICT COURT FOR THE
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

ATLANTIC CASUALTY)	
INSURANCE COMPANY,)	Case No: 1:12-cv-05425
)	
Plaintiff,)	Assigned Judge: Joan H. Lefkow
)	
v.)	Designated Magistrate Judge: Michael T. Nelson
)	
DARECKI CONSTRUCTION, INC.,)	
SHERWOOD BUILDERS CO., INC., ASG)	
DEVELOPMENT, LLC, B & F)	
TECHNICAL CODE SERVICES, INC.,)	
and VASILY SKULABA,)	
)	
Defendants.)	

MOTION FOR JUDGMENT IN FAVOR OF PLAINTIFF

NOW COMES the Plaintiff, ATLANTIC CASUALTY INSURANCE COMPANY (“ATLANTIC”), by its attorneys, CARLSON LAW OFFICES, and requests this Court enter judgment in its favor for relief requested in the Complaint and its Motion for Summary Judgment, stating as follows:

1. Previously, Defendants had agreed to be bound by any judgment in this case except for the underlying tort plaintiff, VASILY SKULABA, who filed an Appearance, but no responsive pleading.
2. Previously, Plaintiff, ATLANTIC CASUALTY, filed its Motion for Summary Judgment, and pursuant to this Court’s Order of July 30, 2013, any Responses were to be filed by August 30, 2013.
3. No Response has been filed, and the time for a Reply has now passed as well.

WHEREFORE, Plaintiff, ATLANTIC CASUALTY INSURANCE COMPANY, respectfully request that this Honorable Court enter summary judgment in favor of ATLANTIC and against all Defendants for the relief requested in the Complaint for Declaratory Judgment finding that ATLANTIC CASUALTY INSURANCE COMPANY has no duty to defend or indemnify DAREKCI CONSTRUCTION, INC., SHERWOOD BUILDERS CO., INC., ASG DEVELOPMENT, LLC, and B & F TECHNICAL CODE SERVICES, INC. under the ATLANTIC policy in connection with the lawsuit VASILY SKULABA.

Respectfully submitted,

**ATLANTIC CASUALTY
INSURANCE COMPANY**

/s/ Keith G. Carlson

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CERTIFICATE OF SERVICE

I, KEITH G. CARLSON, Attorney at Law, certifies that on the 02nd day of October, 2013, electronically filed **MOTION FOR JUDGMENT IN FAVOR OF PLAINTIFF** to be served upon all counsel of record by CM/ECF transmission.

/s/ Keith G. Carlson

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